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March 28, 2000

Sent via e-mail and either hand-delivery, fax, or U.S. Mail

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Bell Atlantic's Local Service Provider Freeze, D.T.E. 99-105

Dear Secretary Cottrell:

Enclosed for filing in the above-referenced matter please find the Attorney General's First Set of Information Requests for AT&T Communications of New England, Inc., regarding the pre-filed testimony of Dawn Russell filed March 24, 2000.

If you have any questions please do not hesitate to call.

Sincerely,

Karl en J. Reed  
Assistant Attorney General  
Regulated Industries Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
617-727-2200

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KJR/kr

Enc.

cc: Paula Foley, Hearing Officer (w/enc.)

Jay E. Gruber, Esq. (w/enc.)

D.T.E. 99-105 Service List (w/enc.)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Investigation by the Department of Telecommunications )  
and Energy, on its own motion, as to the propriety of the )  
Local Service Provider Freeze terms and conditions set ) D.T.E. 99-105  
forth in the following tariff: M.D.T.E. No. 10, Part A, )  
Section 5, Original of Page 1.1, filed with the Department )  
on November 1, 1999 by New England Telephone and )  
Telegraph Company d/b/a Bell Atlantic-Massachusetts. )

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary by e-mail and either hand-delivery, fax, or mail.

Dated at Boston this 28th day of March 2000.

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Karl en J. Reed  
Assi stant Attorney General  
Regul ated Industries Di vi si on  
200 Portl and Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200

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THE ATTORNEY GENERAL' S

I NSTRUCTI ONS FOR RESPONDI NG TO

I NFORMATI ON REQUESTS

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1. These Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to AT&T Communications of New England, Inc. ("AT&T" ) or to any individual or entity sponsoring testimony or retained by AT&T to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If an Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the

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response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

9. If AT&T cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why AT&T cannot answer the Request in full, and state what information or knowledge is in AT&T's possession concerning the unanswered portions.

10. If, in answering any of these Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which supports the response provided.

15. Please provide one copy of each response.

16. The term "Company" refers to AT&T that the data and information requests are directed to. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, agents, and legal counsel.

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17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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THE ATTORNEY GENERAL'S

FIRST SET OF INFORMATION REQUESTS

FOR AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

AG-ATT-1-1 Please provide the number of complaints that AT&T received in the years 1998, 1999, and since January 1, 2000, in which Massachusetts customers claimed that their local, toll, and/or long distance carrier was switched to AT&T without authorization. Please separate your response by year, by category of service (i.e., local, toll, or long distance), and by type of customer (residential or business).

AG-ATT-1-2 Please provide the number of complaints that AT&T received in the years 1998, 1999, and since January 1, 2000, in which Massachusetts customers claimed that their local, toll, and/or long distance carrier was switched from AT&T to another carrier without authorization. Please separate your response by year, by category of service (i.e., local, toll, or long distance), and by type of customer (residential or business).

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AG-ATT-1-3 Regarding Ms. Russell's statement on pages 6 and 7 of her pre-filed testimony that AT&T received 278 initial allegations by business customers of slamming since January 1999, please clarify whether this number reflects solely Massachusetts data.

AG-ATT-1-4 Please provide the following comparative data for Massachusetts residential and business consumers during 1999:

a) The number of consumers who asked AT&T to become their new long distance service provider.

b) The number of consumers who asked AT&T to become their new long distance service provider and who had a PIC restriction.

1) The number of consumers with a PIC restriction who were successfully switched to AT&T's long distance service.

2) The number of consumers with a PIC restriction who were not successfully switched to AT&T's long distance service.

3) The number of consumers with a PIC restriction who were not successfully switched to AT&T's long distance service solely because of the PIC restriction.

c) The number of potential consumers who asked AT&T to become their new long distance service provider and who did not have a PIC restriction.

1) The number of consumers without a PIC restriction who were successfully switched to AT&T's long distance service.

2) The number of consumers without a PIC restriction who were not successfully switched to AT&T's long distance service.

AG-ATT-1-5 Referring to page 15 of Ms. Russell's pre-filed testimony, please identify the states in which the ILEC provides PIC freeze information on the local service customer record that CLECs can access through the ILEC's operations support

systems.

AG-ATT-1-6 Please identify the states in which a neutral third party administers the placement and/or removal of the LSPF or PIC freeze, as Ms. Russell advocates on page 15 of her pre-filed testimony.

AG-ATT-1-7 Would AT&T support a prohibition of all carriers from marketing any LSPF offering made in Massachusetts?

March 28, 2000